

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF
PLAINTIFFS' MOTION TO APPOINT LEAD CLASS COUNSEL**

Plaintiffs Jessica Jones and Christina Lorenzen ("Plaintiffs") move for leave to file a Reply brief in Support of their Motion to Appoint Lead Counsel, ECF No. 380. In support of this Motion, Plaintiffs assert as follows:

1. Defendants opposed Plaintiffs' motion to appoint the Joseph Saveri Law Firm as lead class counsel on two grounds: First, because Defendants argue that Plaintiffs' counsel should be subject to sanctions for pursuing claims which Defendants' dispute related to Varsity's cheerleading camps. Second, Defendants accuse Plaintiffs' counsel of filing too many motions against them.

2. Defendants' arguments in opposition to Plaintiffs' motion to appoint the Joseph Saveri Law Firm as lead class counsel are frivolous, contrary to the facts, and outside of the legitimate inquiry set forth under Rule 23(g). Plaintiffs ask for an opportunity to respond to these claims and assertions.

3. Plaintiffs seek a short reply, of no more than five pages.

4. For all the above reasons, Plaintiffs believe that a reply would be helpful to the Court, because it will allow Plaintiffs to address the arguments made by Defendants to which Plaintiffs have not had an opportunity to respond.

Dated: February 27, 2023

Respectfully submitted,

By: Joseph R. Saveri
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CERTIFICATE OF CONSULTATION

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that on February 27, 2023, my colleague, David Seidel, emailed counsel for the Varsity, Bain, and Charlesbank Defendants (specifically Matt Mulqueen, Savannah Haynes and George Cary); counsel for USASF (Niicole Riccio and Grady Garrison); and counsel for Jeff Webb (Paul Coggins, and Brendan Gaffney) advising them that Plaintiffs intended to file a motion seeking the relief set out above and asking if they opposed. Plaintiffs asked counsel to respond by 2:00 PM Central Time so that Plaintiffs could file this motion today.

Paul Coggins, on behalf of Mr. Webb, responded that Defendant Jeff Webb does not oppose Plaintiffs' request to file a 5-page reply brief.

Nicole Riccio, on behalf of USASF, responded that Defendant USASF does not oppose Plaintiffs' request to file a 5-page reply brief.

Matt Mulqueen, on behalf of the Varsity, Bain, and Charlesbank Defendants responded that those Defendants do not oppose Plaintiffs' request to file a 5-page reply brief.

/s/ Joseph R. Saveri
Joseph R. Saveri